



Ellyn Elise Crutcher  
Counsel

December 2, 1996

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William F. Caton  
Acting Secretary  
Federal Communications Commission  
Mail Stop 1170  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Caton:

RE: CC Docket No. 92-77  
Billed Party Preference for 0+ InterLATA Calls

On behalf of the Consolidated Companies, enclosed is an original plus 11 copies of the Reply Comments in the above proceeding. Please distribute one copy to each commissioner.

Also, please stamp and return the extra copy to confirm receipt. Should you have any questions or require additional information concerning this matter, I can be reached at 217-235-4467. Thank you for your assistance.

Sincerely,

A handwritten signature in cursive script that reads "Ellyn Elise Crutcher".

Ellyn Elise Crutcher  
Counsel for the Consolidated Companies

Enclosures

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D. C. 20554

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In the Matter of )  
)  
)

Billed Party Preference for )  
InterLATA Calls )  
)

CC Docket No. 92-77

JOINT REPLY COMMENTS OF  
CONSOLIDATED COMMUNICATIONS OPERATOR SERVICES INC.  
ILLINOIS CONSOLIDATED TELEPHONE COMPANY  
CONSOLIDATED NETWORK INC.  
AND  
CONSOLIDATED COMMUNICATIONS PUBLIC SERVICES

Consolidated Communications Operator Services Inc., ("CCOS"), Illinois Consolidated Telephone Company ("ICTC"), Consolidated Network Inc. ("CNI") and Consolidated Communications Public Services ("CCPS") (collectively referred to as the "Consolidated Companies") hereby submit their reply comments in response to the Commission's October 10, 1996 request for further comment on specific questions in the above-captioned proceeding ("Public Notice"). The Public Notice proposes that price/rate announcements be made by all operator service providers on all interstate, interLATA 0+ calls.

RATE/PRICE  
DISCLOSURES ON  
ALL 0+ CALLS SHOULD NOT  
BE MANDATED

The Consolidated Companies have actively participated throughout the course of

this docket. Where additional regulation could serve a purpose, such as with the narrowly-drawn benchmarking proposal on certain 0+ calls, the Consolidated Companies have endorsed that approach. The recent Public Notice proposal that rate/price disclosures be made on **all** 0+ calls is excessive.

The Consolidated Companies believe that the majority of callers already know how to place 0+ calls using carriers charging rates familiar to the callers. We agree with US West that callers who are less knowledgeable about how to place calls without incurring high charges still have adequate tools for gaining rate information to protect themselves.<sup>1</sup> The callers can read the signage posted on public phones and at aggregator sites that provide straightforward instruction on how to gain a rate quote from an operator using a 1-800 number without cost to the caller. The Consolidated Companies believe the callers have the means at their disposal to avoid a charge which the callers consider too high. If the signage alone is not enough, then consumer education efforts could be intensified.

The problem to be addressed is relatively small, but the solution of mandatory rate/price disclosures is not tailored to the size, scale or group of callers experiencing difficulties. The result of the proposed disclosures being required across-the-board would be increased call set-up times (even if the caller elects to avoid the rate quote) and increased operator time. These increased costs will ultimately affect the overall price charged the entire base of callers.

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<sup>1</sup> US West comments at 5.

RATE RANGES OR MAXIMUM  
QUOTES SHOULD BE PERMITTED  
IF THE COMMISSION MANDATES  
RATE/PRICE DISCLOSURE

If the Commission mandates rate/price disclosure for all calls despite the concerns previously raised, the Consolidated Companies request that compliance with any Commission mandate include the use of recordings that specify the range of rates for a certain length call or specify the maximum charge for a call of specified duration. This alternative would provide price information to callers without the necessity of operator intervention on automated calls. Giving a precise rate quote would drive costs higher and would not substantially reduce the number of callers experiencing rate problems.

THE COMMISSION SHOULD ALLOW  
ADEQUATE TIME  
FOR IMPLEMENTATION  
OF ANY INCREASED  
COMMISSION REQUIREMENTS

If the Commission mandates rate/price disclosures on all 0+ traffic, carriers will need adequate time to change equipment, modify software and recover their investment in existing configurations. US West notes that its payphone equipment is usually installed for 7-10 years.<sup>2</sup> The Commission should set an implementation date which does not shorten the useful life of the payphone equipment without providing a cost recovery mechanism. It should also allow at least a three-year period for carriers to accomplish any required database construction or software modification.

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<sup>2</sup> US West comments at 18.

## CONCLUSION

For all the above-stated reasons, the Consolidated Companies request the Commission enhance the current means available to callers to obtain rate information about 0+ calls through consumer education. Rate/price quotes on every call is unnecessary and should not be mandated.

In the alternative, the Consolidated Companies would prefer a Commission directive that permits rate ranges or a rate maximum to be quoted via recording, as opposed to a precise rate quote for the call given via a live operator at considerable cost.

Finally, the Commission should provide an adequate period for implementation of any new requirement and the means to recover costs imposed thereby.

Respectfully submitted,

A handwritten signature in cursive script, reading "Ellyn Elise Crutcher".

Ellyn Elise Crutcher

Counsel for the Consolidated Companies

Consolidated Communications Operator  
Services Inc.

Illinois Consolidated Telephone Company

Consolidated Network Inc.

Consolidated Communications Public  
Services

121 South 17th Steet  
Mattoon, IL 61938

### CERTIFICATE OF SERVICE

I Ellyn Elise Crutcher, hereby certify that on this 2nd day of December, 1996, a true copy of the foregoing "Reply Comments" of the Consolidated Companies in the matter of Billed Party Preference for 0+ interLATA calls, CC Docket No. 92-77, was served via UPS Overnight, Fees Paid, or by U.S. First Class Mail, Postage Prepaid, upon each of the parties listed below.

Regina Keeney, Acting Chief Common Carrier Bureau Federal Communications Commission 1919 M Street, N.W., Room 500 Washington, D.C. 20554	Carol Matthey, Deputy Bureau Chief (Policy) Federal Communications Commission 1919 M Street, N.W., Room 544 Washington, D.C. 20554
Richard Welch Chief, Policy & Planning Federal Communications Commission 1919 M Street, N.W., Room 544 Washington, D.C. 20554	Mark Nadel Policy & Program Planning Division Federal Communications Commission 1919 M Street, N.W., Room 544 Washington, D.C. 20554
International Transcription Service 1919 M Street, N.W. Washington, D.C. 20554	



Ellyn Elise Crutcher